

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
NICHOLE ADAMS-FLORES
individually and on behalf of all others similarly situated,

**DOCKET NO.: CV-18-12150
(JMF)**

Plaintiff,

-against-

THE CITY OF NEW YORK, DEPARTMENT OF
CORRECTIONS, CYNTHIA BRANN,

Defendants.
-----X

**DECLARATION OF FREDERICK K. BREWINGTON
IN SUPPORT OF PLAINTIFF’S MEMORANDUM OF LAW
IN OPPOSITION TO DEFENDANTS’
MOTION IN LIMINE**

I, **FREDERICK K. BREWINGTON**, declare under the pains and penalties of perjury pursuant to 28 U.S.C. §1746, that the following statements are true and correct, to the best of my knowledge:

1. I am one of the attorneys representing Plaintiff Dr. Nicole Adams-Flores (hereinafter “Dr. Adams” or Plaintiff). I submit this Declaration in support of Plaintiff’s Memorandum of Law and Supporting Papers in Opposition to Defendants **THE CITY OF NEW YORK, DEPARTMENT OF CORRECTIONS, CYNTHIA BRANN, Commissioner of Dept. of Corrections** (collectively “Defendants”) Motion *In Limine*.

2. Attached as Exhibit A is a true and accurate copy of Dr. Vernarelli’s Expert Report. Adams’ Deposition transcripts conducted on October 21, 2021 and November 9, 2021.

3. Attached as Exhibit B is a true and accurate copy of Dr. Adams' Deposition transcripts conducted on October 21, 2021 and November 9, 2021.

4. Attached as Exhibit C is a true and accurate copy of Plaintiff's Trial Exhibit 6.

5. Attached as Exhibit D is a true and accurate copy of Plaintiff's Trial Exhibit 14.

6. Attached as Exhibit E is a true and accurate copy of Plaintiff's Trial Exhibit 22.

7. Attached as Exhibit F is a true and accurate copy of Bruce Farbstein's Deposition conducted on November 3, 2021.

8. Attached as Exhibit G is a true and accurate copy of Brian Goldberg's Deposition conducted on March 17, 2022.

9. Attached as Exhibit H is a true and accurate copy of Plaintiff's Trial Exhibit 8.

10. Attached as Exhibit I is a true and accurate copy of Plaintiff's Trial Exhibit 11.

11. Attached as Exhibit J is a true and accurate copy of of Plaintiff's Trial Exhibit 17.

12. Attached as Exhibit K is a true and accurate copy of of Plaintiff's Trial Exhibit 12.

13. Attached as Exhibit L is a true and accurate copy of Plaintiff's Trial Exhibit 13.

14. Attached as Exhibit L is a true and accurate copy of *Wellner v. City of New York et al.* 16-CV-7032 April 1, 2019 Conference Transcript before Hon. Judge Koeltl.

Dated: Hempstead, New York
September 15, 2023

Respectfully submitted,

LAW OFFICES OF
FREDERICK K. BREWINGTON

By: /s/ Frederick K. Brewington
FREDERICK K. BREWINGTON
Attorneys for Plaintiff
556 Peninsula Boulevard
Hempstead, New York 11550
(516) 489-6959

DOCKET NO.: CV-18-12150 (JMF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

NICHOLE ADAMS-FLORES

individually and on behalf of all others similarly situated,

Plaintiff,

-against-

THE CITY OF NEW YORK, DEPARTMENT OF
CORRECTIONS, CYNTHIA BRANN
Defendants.

-----X

DECLARATION OF FREDERICK K. BREWINGTON
IN SUPPORT OF PLAINTIFF'S MEMORANDUM OF LAW IN
OPPOSITION TO DEFENDANTS'
MOTION *IN LIMINE*

-----X

LAW OFFICES OF
FREDERICK K. BREWINGTON
Attorneys for Plaintiff
556 Peninsula Boulevard
Hempstead, New York 11550
516-489-6959